

October 14, 2014

Mr. Charles David Abshire (6SF-AP)
Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

RE: September 2014 Monthly Progress Report
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

The Malone Cooperating Parties (MCP) submit the September 2014 Monthly Progress Report in compliance with the Consent Decree and Statement of Work for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX.

Should you have any questions, please contact me at 919-539-1928 or bobp@projectnavigator.com.

Sincerely,

R Piniewski

Robert Piniewski
Project Coordinator

cc: Marilyn Long - TCEQ
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE
SEPTEMBER 2014 MONTHLY PROGRESS REPORT
SUBMITTED OCTOBER 14, 2014**

1) SUMMARY OF WORK PERFORMED IN SEPTEMBER 2014

- a) Project Navigator Ltd., ENTACT and MCP representatives continued planning for Phase Two RD/RA work. Work conducted during September included:
 - (1) Development of best management practices for storm water
 - (2) Basis of design work for a water treatment system
 - (3) Development of draft Phase Two RD/RA Work Plans (e.g., landfill design, pilot test report)
- b) MCP representatives submitted Mechanical Integrity Test (MIT) results and workover reports for WDW-73 and WDW-138 to EPA and TCEQ. MCP representatives also continued work on reissuance of the No Migration Exemption and the installation of the WDW-138 automation system.
- c) MCP representatives continued efforts on the cemetery relocation work.
- d) MCP representatives continued storm water management activities at the Site.

2) SUMMARY OF SAMPLING/TESTING RESULTS

- a) No sampling was conducted during this reporting period.

3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS

- a) A summary of the most recent Agency Communication is shown in Table 1.

4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN

- a) None.

5) COMMUNITY RELATIONS ACTIVITIES

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

6) CHANGE IN PERSONNEL OR OPERATIONS

- a) None.

7) SCHEDULE

- a) The MCP will submit the draft Phase Two Work Plans by October 20, 2014.

**8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS
(OCTOBER and NOVEMBER 2014)**

- a) Submit a request to EPA to modify the performance specification for treated material (solidified sludge) at the Site from a minimum Unconfined Compressive Strength (UCS) of 25 psi with no free liquids to a minimum UCS of 15 psi with no free liquids.
- b) Submit draft Phase Two RD/RA Work Plans.
- c) Submit addendum to the Storm Water Management Plan describing best management practices and treatment system requirements for Phase Two work.
- d) Prepare the petition for renewal of the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells.
- e) Complete automation system for WDW-138 and install surface components for WDW-73.
- f) Continue Cemetery Relocation efforts for reinterment.
- g) Continue storm water management activities at the Site.

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One RA Work Plan due to the Government shutdown.	12/12/13	EPA approved the request.	
12/20/13	Submitted draft Phase One RA Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	EPA comments received on 1/31/14.	
1/31/14	MCP received EPA & TCEQ comments on Phase One RA Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	
2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	

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Malone Service Company Superfund Site – Texas City, TX

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2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		
3/3/14	The MCP submitted its responses to Agency comments on the draft Phase One RA Work Plan.	3/4/14	EPA approved the response to comments via email.	
3/4/14	The MCP received information from EPA to facilitate the approval/reissuance of the No Migration Exemption for the injection well.	n.a.		
3/6/14	The MCP submitted a copy of the order of the Galveston County District Court granting our motion for summary judgment on the petition for removal of remains and removal of the cemetery dedication regarding the cemetery area at the Malone Site.	n.a.		
3/10/14	The MCP submitted the Final Phase One RA Work Plan and Storm Water Management Plan V1.	3/25/14	EPA approved the Phase One RA Work Plan.	
3/25/14	The MCP notified EPA and TCEQ that ENTACT will mobilize to the Site on April 7, 2014 to begin Phase One RA work and that MCP representatives will also be mobilizing on April 7, 2014 to begin cemetery relocation work.	n.a.		
4/7/14	The MCP submitted a request to shift the installation of the dewatering system and slurry wall from Phase Two to Phase One RA work. The early install of these remedy elements will allow the MCP to begin dewatering sooner and improve solidification efforts.	4/10/14	EPA approved the request.	
5/9/14	The MCP submitted the injection well rehabilitation procedures for the injection wells at the Site.	5/29/14	EPA approved the procedures.	

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Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
6/12/14	The MCP submitted revised injection well rehabilitation procedures for injection well WDW-138.	6/13/14	EPA approved the revised procedures.	
8/15/14	The MCP requested a 60 day extension for submittal of the draft Phase Two RD/RA Work Plans	8/18/14	EPA approved the extension.	
9/4/14	The MCP submitted WDW-138 MIT and workover reports.			
9/29/14	The MCP submitted WDW-73 MIT and workover reports.			